

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

MARIA DENISE GANGLER,

Defendant.

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CRIMINAL NO. GLR-18-293

MOTION FOR ORDER OF FORFEITURE

1. The United States of America, by its counsel, hereby moves pursuant to Federal Rule of Criminal Procedure 32.2(b)(1)(A) for an Order of Forfeiture.

2. On June 26, 2018, defendant Maria Denise Gangler (“Gangler”) pled guilty to Count One of the Indictment, which charged her with conspiracy to commit bankruptcy fraud, in violation of 18 U.S.C. Section 371. In the plea agreement, the defendant stipulated to the entry of an order of forfeiture as to “all property constituting, derived from, or traceable to the gross proceeds obtained directly or indirectly as a result of this offense, which the parties stipulate consists of \$14,000 in U.S. currency with Bank of Ocean City money wrappers dated September 2012, which was seized by law enforcement on October 25, 2017.”

3. Rule 32.2(b)(1) provides: “If the court finds that property is subject to forfeiture, it must promptly enter a preliminary order of forfeiture setting forth the amount of any money judgment” According to subsection (b)(3) of that Rule, “[a]t sentencing . . . the order of forfeiture becomes final as to the defendant and must be made a part of the sentence and be included in the judgment.”

4. The Court’s order shall “authorize[] the Attorney General . . . to seize the specific property subject to forfeiture.” Fed. R. Crim. P. 32.2(b)(3).

5. **WHEREFORE**, the United States respectfully requests that the Court enter a criminal forfeiture against \$14,000 in U.S. currency with Bank of Ocean City money wrappers dated September 2012, which was seized by law enforcement on October 25, 2017. A proposed Order of Forfeiture is submitted herewith for the convenience of the Court.

Respectfully submitted,

Robert K. Hur
United States Attorney

By: _____/s/_____
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Dated: October 12, 2018

CERTIFICATE OF SERVICE

This is to certify that a copy of this motion was filed and delivered via email to the ECF email address of record for defendant's counsel.

_____/s/
Harry M. Gruber
Assistant United States Attorney